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Attorney for Defendant  
SANDRA LE

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SANDRA LE,

Defendant.

Case No. CR 21-00331 WHO

**STIPULATION TO VACATE AND  
RESET STATUS HEARING AND  
EXCLUDE TIME FROM MAY 12, 2022  
TO JUNE 23, 2022; ORDER**

It is stipulated by and between counsel for the United States and counsel for the defendant, Sandra Le, that the status conference scheduled for May 12, 2022 at 1:30 PM before the Hon. William H. Orrick be vacated and rescheduled for June 23, 2022 at 1:30 PM.

On March 31, 2022, the Government produced significant and voluminous supplemental discovery in this matter. The Government further intends to produce additional supplemental discovery. Defense counsel continues to review the produced discovery, and defense counsel requires additional time to process and evaluate the discovery, as well as review the discovery with Ms. Le, before proceeding.

Based on the foregoing, the parties stipulate and agree that excluding time from May 12, 2022 until June 23, 2022 will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from May 12, 2022 until June 23, 2022 from computation under the Speedy

1 Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §  
2 3161(h)(7)(A), (B)(iv).

3 Undersigned defense counsel certifies that she obtained approval from the Assistant  
4 United States Attorney to file this stipulation and proposed order.

5 **IT IS SO STIPULATED**  
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9 DATED: May 10, 2022

By: /s/  
10 Ashley Riser  
11 Counsel for SANDRA LE

12 DATED: May 10, 2022

UNITED STATES ATTORNEY'S OFFICE

14 By: /s/  
15 KENNETH CHAMBERS  
16 Attorneys for Plaintiff  
UNITED STATES OF AMERICA  
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**ORDER**

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court vacates the status conference scheduled for May 12, 2022 at 1:30 P.M. and reschedules it for June 23, 2022 at 1:30 PM. The Court further finds that failing to exclude the time from May 12, 2022 until June 23, 2022 would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from May 12, 2022 until June 23, 2022 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial.

Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from May 12, 2022 until June 23, 2022 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

DATED: May 11, 2022



HON. WILLIAM H. ORRICK  
United States District